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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATRINA COX,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:19-cv-01591-VCF

**STIPULATION TO VOLUNTARY
REMAND PURSUANT TO SENTENCE
FOUR OF 42 U.S.C. § 405(g) AND TO
ENTRY OF JUDGMENT FOR
PLAINTIFF**

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, and with the approval of the Court, that this action be remanded for further administrative action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

On remand, the Appeals Council will assign the case to a new Administrative Law Judge (ALJ). The Appeals Council will instruct the ALJ to: offer Plaintiff the opportunity of a hearing; reassess the opinions of record, including that of Dr. Jurani, and explain the weight afforded to each of these opinions; reassess Plaintiff's residual functional capacity consistent with SSR 96-8p; and proceed with the sequential evaluation, as necessary.

1 The parties further request that the Clerk of the Court be directed to enter a final judgment in
2 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

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4 Dated: January 23, 2020

Respectfully submitted,

5 OLINSKY LAW GROUP

6 /s/ Matthew R. McGarry
7 MATTHEW R. MCGARRY
8 (*as authorized via email on January 23, 2020)
Attorney for Plaintiff

9 Dated: January 23, 2020

Respectfully submitted,

10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 /s/ Allison J. Cheung
13 ALLISON J. CHEUNG
14 Special Assistant United States Attorney
Attorneys for Defendant

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20 IT IS SO ORDERED:

21 
22 HON. CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

23 DATED: 1-23-2020
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1 **CERTIFICATE OF SERVICE**

2 I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the
3 foregoing **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR**
4 **OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the date, and via
5 the method of service, identified below:

6 **CM/ECF:**

7 Matthew R. McGarry
8 mmcgarry@windisability.com
9 Attorney for Plaintiff

10 Hal Taylor
11 haltaylorlawyer@gbis.com
Attorney for Plaintiff

12 Dated: January 23, 2020

13 */s/ Allison J. Cheung*
14 ALLISON J. CHEUNG
15 Special Assistant United States Attorney
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